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October 18, 2024

By ECF

Hon. J. Paul Oetken
U.S. District Judge
U.S. Courthouse 40
Foley Square,
New York, N.Y. 1000

Re: Rodney Jones v. Sean Combs, et al
24 Civ. 1457 (JPO)

Dear Judge Oetken:

Deborah Colson and I represent Kristina Khorram, one of the defendants in the above-captioned action. Ms. Khorram is named in the first cause of action, the civil RICO claim, and the sixth cause of action, alleging violation of the Trafficking and Victims' Protection Act. I have reviewed the reply brief in support of the motion to dismiss filed on behalf of the defendant Sean Combs and several of his corporate entities, and the legal arguments made on behalf of Mr. Combs apply with equal, if not greater force to Ms. Khorram. Plaintiff's opposition to the motion relies heavily on the allegations in the criminal indictment filed against Mr. Combs and on allegations made in several other lawsuits filed against him in this district. Ms. Khorram is not named in the indictment, nor is she a defendant in any of the other lawsuits filed against Mr. Combs. Thus, even if the Court considers those legal proceedings to be relevant to the issues raised in the motion to dismiss, they do not cure any of the defects in the complaint relating to Ms. Khorram. Indeed, Plaintiff's opposition papers make no attempt to cure any of the defects in the Second Amended Complaint with regard to Ms. Khorram. Accordingly, we respectfully request permission to join in the reply brief filed on behalf of Mr. Combs, to the extent that it applies to the allegations made against Ms. Khorram.

Thank you in advance for your consideration of this request.

Respectfully submitted,
avraham moskowitz
Avraham C. Moskowitz
Deborah Colson